

**** E-filed June 15, 2010 ****

MOORE LAW FIRM, P.C.
K. RANDOLPH MOORE - 106933
TANYA MOORE - 206683
332 N. Second Street
San Jose, CA 95112
Telephone: (408) 271-6600
Facsimile: (408) 298-6046

Attorneys for Plaintiff
Clarisa Alma Hernandez

CAMPBELL, Warburton, Fitzsimmons,
Smith, Mendell & Pastore
J. Michael Fitzsimmons - 132343
64 West Santa Clara Street
San Jose, CA 95113
Telephone: (408) 295-7701
Facsimile: (408) 295-1423

Attorneys for Defendant
John R. Chace

HANSON BRIDGETT LLP
KURT A. FRANKLIN - 172715
kfranklin@hansonbridgett.com
425 Market Street, 26th Floor
San Francisco, CA 94105
Telephone: (415) 777-3200
Facsimile: (415) 541-9366

Attorneys for Defendant
Vegetarian House, Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CLARISA ALAMA HERNANDEZ,

Plaintiff,

v.

THE SUPREME MASTER CHING HAI
INTERNATIONAL ASSOCIATION
VEGETARIAN HOUSE, INC. d/b/a
VEGETARIAN HOUSE and JOHN R.
CHACE,

Defendants.

No. CV-10-02033 HRL

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Action Filed: May 11, 2010
Trial Date: Not set

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFS TO RESPOND TO
PLAINTIFF'S COMPLAINT (CASE NO.: CV-10-02033 HRL)

Pursuant to Local Rule 6-1(a), Clarisa Alma Hernandez ("Plaintiff") and Defendants The Supreme Master Ching Hai International Association Vegetarian House, Inc. d/b/a Vegetarian House and John R. Chace ("Defendants"), by and through their respective attorneys of record, Tanya Moore of Moore Law Firm, P.C., J. Michael Fitzsimmons of Campbell, Warburton, Fitzsimmons, Smith, Mendell & Pastore and Kurt A. Franklin of Hanson Bridgett LLP, state, agree and stipulate as follows:

1. No extension of time has been previously obtained.
2. Upon being retained, counsel for Defendant Vegetarian House called Plaintiff's counsel. The parties desire to explore early resolution, without the expense of filing a responsive pleading.
3. The parties respectfully request that Defendants be granted forty-five (45) days from the date of the order to file a responsive pleading to the Complaint.
4. If this matter does not resolve pre-answer, this request may affect the case schedule as it relates to formal service and FRCP 26(a) and General Order 56 exchanges, in addition to timelines to consent to assignment of a United States Magistrate Judge for trial.

IT IS SO STIPULATED effective as of June 3, 2010.

DATED: June 10, 2010

MOORE LAW FIRM, P.C.

By: Tanya Moore

TANYA MOORE
Attorneys for Plaintiff
CLARISA ALMA HERNANDEZ

DATED: June 10, 2010

CAMPBELL, Warburton, FITZSIMMONS,
SMITH, MENDELL & PASTORE

By: J. Michael Fitzsimmons
J. MICHAEL FITZSIMMONS
Attorneys for Defendant
JOHN R. CHACE

DATED: June 3, 2010

HANSON BRIDGETT LLP

By: Kurt A. Franklin
KURT A. FRANKLIN
Attorneys for Defendant
VEGETARIAN HOUSE, INC.

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFS TO RESPOND TO PLAINTIFF'S COMPLAINT (CASE NO.: CV-10-02033 HRL)

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Defendants The Supreme Master Ching Hai International Association Vegetarian House, Inc. d/b/a Vegetarian House and John R. Chace shall file an Answer or other responsive pleading within forty-five (45) days of the date of the Order.

IT IS HEREBY ORDERED:

DATED: June 15, 2010

By: 

HOWARD R. LLOYD
United States Magistrate Judge